

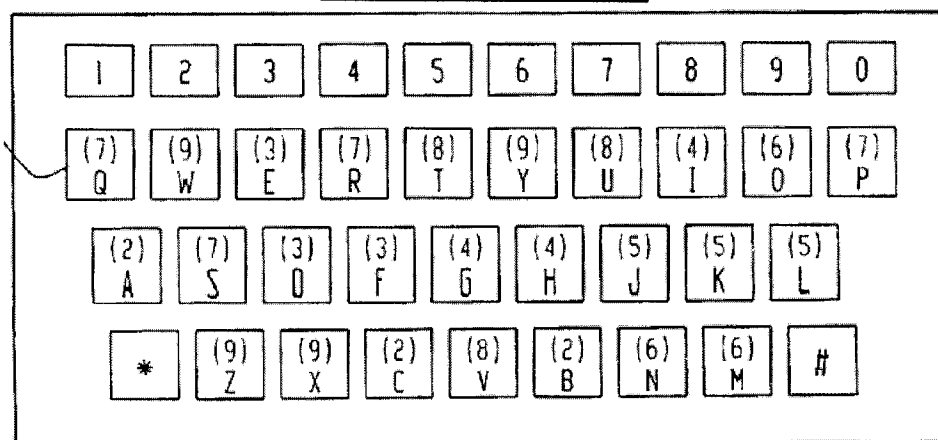
REMARKS

Claims 42 and 44-53 are pending. They are rejected over Nokia User Manual in view of Kato et al. These rejections should be withdrawn in view of the following remarks:

Independent Claim 42

Claim 42 recites a keyboard having “twenty six keys that are each labeled with a different letter of the alphabet and with a number ... , the number being 2-9 respectively for keys labeled with A-C, D-F, G-I, J-L, M-O, P-S, T-V and W-Z.” This means that “2” is labeled on the three keys labeled A-C, and “3” is labeled on the three keys labeled D-F, etc, as exemplified in the application by Fig. 1 (reproduced below):

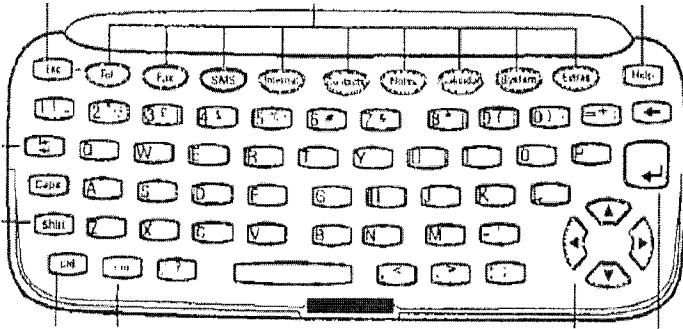
APPLICATION FIG. 1



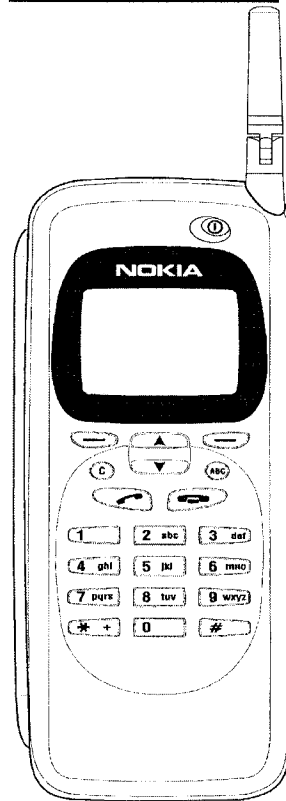
Claim 42 is rejected over Nokia's Figs. 2-11 and 1-1 and Kato's Fig. 11 (all three figures reproduced below). However, none of these references suggest labeling each number on **several** letter keys as claimed (such as “2” labeled on three keys labeled A, B and C as claimed). In fact, the references teach away from this limitation by consistently showing each number labeled on **only one** key.

Therefore, claim 42 is patentable over the cited art.

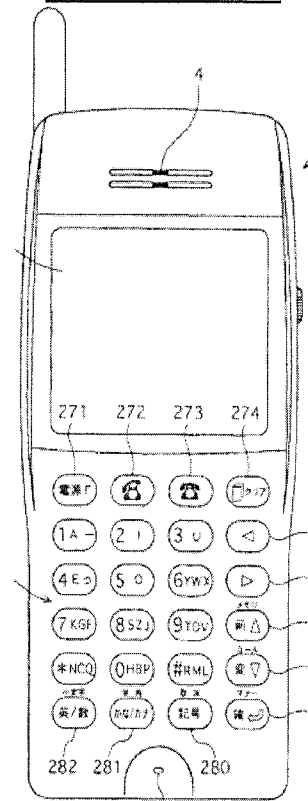
NOKIA FIG. 2-11



NOKIA FIG. 1-1



KATO FIG. 11



Independent Claim 47

In claim 47, each of the keyboard's 26 letter keys is assigned a number. This is exemplified by the application's Fig. 1 (reproduced above).

Claim 47 is rejected over Nokia's Fig. 2-11 in view of Kato's Fig. 11 (both reproduced above). Kato pairs each number from 1 to 5 with a different letter. The Examiner contends that it would have been obvious to apply Kato's numbers to all 26 keys of Nokia's keyboard to arrive at claim 47.

The Examiner's contention is incorrect for several reasons. First, the skilled person would find no benefit in adding Kato's numbers to Nokia's letter keys, since Nokia's keyboard already has specially-designated number keys. Secondly, adding numbers to the Nokia keyboard's keys would destroy its standard-keyboard layout, which is what the user expects and is used to using. Thirdly, even if the skilled person did add Kato's numbers to Nokia's letter keys, he would not have arrived at claim 47. That is because the skilled person would have added, at most, ten numbers (0-9) to **ten** of Nokia's letter keys. The skilled person would not have added numbers to **all 26** letter keys to arrive at claim 47, since the prior art suggests no benefit or layout-scheme for adding more numbers than ten. Therefore, claim 47 is patentable over the cited art.

Independent Claim 51

Claim 51 recites a keyboard with letters arranged in a QWERTY configuration. Each letter is assigned a number, as exemplified by the application's Fig. 1 (reproduced above).

Claim 51 is rejected over Nokia's Figs. 2-11 and 1-1 in view of Kato's Fig. 11 (all three figures reproduced above). The Examiner contends that it would have been obvious to apply Kato's numbers to the keys of Nokia's Figs. 2-11 QWERTY keyboard to arrive at claim 51. However, the skilled person would have been dissuaded from doing so, because doing so would destroy the standard-keyboard layout that the user expects and is used to.

Furthermore, Nokia pages 1-1 and 1-2 explain that even though Nokia's cell phone has a telephone keypad (of Fig. 1-1) for making phone calls, it ALSO has the keyboard (of Fig. 2-11) for other applications in order to "make using the applications easy." Nokia's keyboard makes the applications "easy" by separating the letters from the numbers (vs. the keypad which pairs letters with numbers on the same key) and arranging them as in a standard computer keyboard to match what the user is used to typing with. This would have dissuaded the skilled person from adding Kato's numbers to Nokia's keyboard letter keys, because doing so would render the keyboard similar to, and thus redundant to, the keypad that already exists on the opposite side of the phone.

Therefore, claim 51 is patentable over the cited art.

Dependent Claims 44-46, 48-50 and 52-53

The remaining claims all depend from base claims that are explained above to be patentable over the prior art. The limitations that the dependent claims add to the base claims distinguish them further from the prior art. Therefore, the dependent claims are also patentable over the prior art.

The application is therefore now in condition for allowance.

Respectfully submitted,



Mitchell Rose (Reg. No. 47,906)

JONES DAY

901 Lakeside Ave.

Cleveland, OH 44114

(216)586-7094

Date: 5/2/08